## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC
This document relates to Maria M. Pace,	STIPULATION OF DISMISSAL
Individual Case No. 17-2172	WITH PREJUDICE

## STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW, Plaintiffs Maria M. Pace and James R. Pace and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the Civil Action No. 17-cv-2172 with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss Civil Action No. 17-cv-2172 in its entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully submitted this 29th day of October, 2020.

s/Douglas E. Chabot Douglas E. Chabot dec@decof.com

Decof, Barry, Mega & Quinn, P.C. 1 Smith Hill

Providence, Rhode Island 02903

Phone: 401-272-1110 Fax: 401-351-6641

s/Richard B. North, Jr. Richard B. North, Jr.

richard.north@nelsonmullins.com NELSON MULLINS RILEY &

SCARBOROUGH LLP

201 17th St. NW, Ste. 1700

Atlanta, GA 30363 P: 404.322.6000 F: 404.332.6397

Attorneys for Plaintiffs

Attorneys for Defendants C. R. Bard, Inc. and Bard Peripheral Vascular Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/Douglas E. Chabot